



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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NTC GREAT LAKES
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April 6, 2009

Engineering Field Activity, Midwest
Attn: Mr. Howard Hickey
Building 1A, Code 931
201 Decatur Avenue
Great Lakes, Illinois 60088-5600

Re: Draft Record of Decision for Site 17
Pettibone Creek and Boat Basin
Naval Station, Great Lakes
Great Lakes, Illinois

0971255048 - Lake
Great Lakes Naval Station
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Revised Draft Record of Decision (ROD) for Site 17, Pettibone Creek and Boat Basin, Naval Station Great Lakes. It was drafted by Tetra Tech NUS, Inc. on behalf of the Naval Facilities Engineering Command (Navy). It was dated February 2009 and was received at the Agency on February 17, 2009. The Record of Decision presents the selected remedy for contaminated sediment at Site 17, Pettibone Creek and Boat Basin, located at Naval Station Great Lakes. The remedial actions have been selected in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The Agency has reviewed the submittal and is providing the following comments.

- 1) **Section 1.2 and 1.6** - The Administrative Record (AR) for Naval Station Great Lakes is mentioned here, but its location is not provided. Please identify where the AR can be found.
- 2) **Section 2.2.1** - The last sentence mentions several possible off-site sources that have contributed to elevated concentrations of contaminants in Pettibone Creek and the Boat Basin. Illinois EPA does not dispute that claim. However, it does not state here the possible on-site sources that are just as likely to have contributed. Those sources should be listed here as well.

- 3) **Section 2.3** – The dates for the public comment period need to be updated to match that specified in Section 2.12.
- 4) **Section 2.5** – The conceptual site model (CSM) should be discussed and a figure provided here.
- 5) **Section 2.5.3** – This section does not indicate whether the sediments in the creek and basin will be hazardous waste when they are dredged/generated. The regulatory classification of the materials at the site must be known and identified in order to properly evaluate the remedial alternatives and to identify the Applicable or Relevant and Appropriate Regulations (ARARs) for any remedial action. Specifically, it must be determined whether the contaminated media exhibit a characteristic of a hazardous waste or contain a listed hazardous waste. This information is necessary as the classification of the waste will impact the cost and implementation of the remedy. As an example, Figure 2-4 indicates lead contaminated sediments will need to be treated (fixated) prior to disposal, implying that hazardous waste will be generated. It should be noted that according to 35 Illinois Administrative Code (IAC) 721.104(g), dredged material that is subject to the requirements of a permit that has been issued under Section 404 of the Federal Water Pollution Control Act (33 USC 1344) is not a hazardous waste.
- 6) **Section 2.6.2** – In the fourth sentence on page 2-13, it states “the concentrations of pesticides are indicative of those associated with typical applications of the pesticides when it was legal to do so.” Please explain how pesticide concentrations found in sediments are “indicative of those associated with typical applications of the pesticides when it was legal to do so.” Were those typical applications to aquatic environments or typical applications to non-aquatic/upland environments with exposure to sediments via run-off?
- 7) **Section 2.7** – The discussion of remedial goals needs to indicate whether the removal of sediments that exhibit a characteristic of a hazardous waste is also a goal. The Agency wants to ensure the remedial action does not leave behind sediments that exhibit a characteristic of a hazardous waste. If that were the case the RCRA Closure and post-closure requirements would be considered applicable.
- 8) **Section 2.8.4** – The volume of sediment to be removed and the cost value listed here are inconsistent with the values listed in the Proposed Plan. Please review and revise as necessary throughout.
- 9) **Section 2.8.4** – The last sentence states “the Navy would not commit resources to this alternative until it has been determined that the sources of upstream contamination have been eliminated.” However, Section 2.10.2.2, 6th paragraph states excavation of Pettibone Creek will be initiated in 2009. Please explain what steps have been or are

being taken to determine that the sources of upstream contamination have been eliminated or will be prior to this remedial action taking place.

- 10) **Section 2.10.2** – There needs to be included here a detailed, activity-based breakdown of the estimated costs associated with implementing and maintaining the remedy. The breakdown should include capital costs, annual operations and maintenance (O & M) costs, duration of O & M costs, discount rate, and total present worth cost.
- 11) **Section 2.10.2.2** – Will there be preventative measures taken to ensure resuspended contaminated sediments do not enter the inner/outer harbor while dredging the boat basin? What measures would be taken?
- 12) **Section 2.10.2.3** – Will water/runoff from on-site dewatering of sediments be sampled? What precautions will be taken to limit or prevent the release of contaminants in dissolved form?
- 13) **Section 2.10.2.5** – This section should be expanded to discuss the anticipated environmental and ecological benefits that will result from implementation of the selected remedy. It should include topics such as restoration of sensitive ecosystems, protection of endangered species, protection of wildlife populations, and wetlands restoration, where appropriate.
- 14) **Section 2.11.4** – As noted previously, the cost value listed here is inconsistent with the value listed in the Proposed Plan. Please review and revise as necessary.
- 15) **Section 2.12** – The information presented here will need to be updated once the public comment period has concluded.
- 16) **Table 2-4** – The chemical-specific ARARs listed in this table do not match those found in Tables 2-1 and 2-2 in the Feasibility Study for Site 17. These tables should match. The omissions include, but are not limited to, the Illinois EPA groundwater quality regulations at 35 IAC 620 and the Lake Michigan Basin Water Quality Standards found as 35 IAC 302 Subpart E. Please revise accordingly.
- 17) **Table 2-6** – If hazardous waste is generated and managed in a unit at the site, the Resource Conservation and Recovery Act (RCRA) regulations would be applicable rather than potentially relevant and appropriate as indicated in this table.
- 18) **Table 2-6** – This table indicates the RCRA requirements for miscellaneous units are potentially relevant and appropriate. However, the description of alternatives in Section 2.8 does not specifically include the use of such a unit. In addition, depending on the design and operation of the unit, the requirements for a corrective action management unit (CAMU) at 35 IAC 724 Subpart S may also be ARAR for a remedy at this site.

- 19) **Table 2-6** – The Land Disposal Restrictions will be applicable to hazardous waste generated during the remediation that goes to a landfill or is placed in a land based unit. These ARARs are not discussed in the submittal.
- 20) **Tables 2-5 and 2-6** – The Illinois Endangered Species Act and the Illinois Historic Preservation Act should also be listed as ARARs. For questions and information inquiries: NHPA: Anne Haaker 217.785.5027; <http://dnrecocat.state.il.us/ecopublic>
- 21) **Section 3.0** – The Responsiveness Summary will need to be revised as necessary once the public comment period has been completed.
- 22) **General Comment** - There are several references to “backfilling with clean material” when discussing the excavation of sediment from the creek. Please define “clean material.” What criteria will be used to deem the material “clean” and appropriate for placement in a stream or stream corridor? The Illinois Department of Natural Resources (IDNR) will be very interested in providing professional insight regarding material appropriate for placement in this stream system and restoring the stream within appropriate means.
- 23) **General Comment** - The Navy claims a CERCLA 5-year review is not necessary given the remedy will permanently remove contaminated sediment from the site. That is an accurate assessment. However, because potential upstream sources of contamination are mentioned several times in the document, conducting a 5-year review or some other regularly scheduled monitoring may help support the Navy’s future proof of innocence regarding subsequent contamination of the stream system.
- 24) **General Comment** - The document refers to “Illinois sediment criteria” and “background sediment concentrations reported by IEPA.” The IEPA 2002 listed in the references is the standard material referred to as TACO. The TACO regulations pertain to soil concentrations rather than sediment. Please clarify and more thoroughly describe the sediment criteria and background concentrations being referred to here.
- 25) **General Comment** – The IDNR Office of Water Resources (OWR) should be consulted regarding the permitting necessary to complete the proposed action. Projects such as the one proposed for the North Branch of Pettibone Creek often require authorizations from the United States Army Corps of Engineers, IDNR OWR, and the Illinois EPA. For IDNR OWR specific questions contact: IDNR Office of Water Resources, NE IL Regulatory Programs, 847.608.3100 ext 2025 or visit <http://www.dnr.state.il.us/owr/resman/permitprogs.htm>.

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Naval Station Great Lakes
April 6, 2009
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If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or by electronic mail at brian.conrath@illinois.gov.

Sincerely,

Brian A. Conrath

Brian A. Conrath
Remedial Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Bureau of Land

BAC: *BAC*
BAC: \\frac:HGLNTC\Site 17related\Site17DRODrvw

cc: Bob Davis, Tetra Tech NUS, Inc.
Beth Whetsell, IDNR

Owen Thompson, USEPA (SR-6J)